

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

A.E.S.E., a minor child, and EUSEBIO DANIEL SABILLON PAZ, her father,

Plaintiffs,

V.

UNITED STATES OF AMERICA and
MANAGEMENT & TRAINING
CORPORATION,

Defendants.

Case No. 2:21-cv-00569-RB/GBW

**STIPULATED MOTION FOR EXTENSION OF TIME TO FILE MOTION TO
COMPEL**

Plaintiffs respectfully submit this Stipulated Motion for Extension of Time to File Motion to Compel and state as follows:

1. On March 24, 2023, Plaintiffs served their First Set of Interrogatories, First Set of Requests for Production of Documents, and Request For Entry onto Land to Defendant Management & Training Corporation (the “Discovery Requests”).
2. Defendant Management & Training Corporation (“MTC”) requested, and Plaintiffs granted, an extension to May 12, 2023 to serve its responses to the Discovery Requests.
3. On May 12, 2023, MTC served its Objections, Answers, and Responses to Plaintiffs’ Discovery Requests, along with a production (collectively, “MTC’s Response and Production”).
4. On May 31, 2023, Plaintiffs sent a letter to MTC discussing deficiencies in

MTC's Response and Production. The parties have since engaged in good faith discussions around the scope and content of MTC's responses, objections, and answers to the Discovery Requests.

5. On June 27, 2023, the Court granted Plaintiffs' Motion for Extension of Time for Filing a Motion to Compel, *doc. 120*, extending Plaintiffs' deadline to two weeks following the service of Defendant MTC's supplemental responses.

6. On August 9, 2023, MTC served their First Supplemental Responses to Plaintiffs' First Set of Interrogatories and Request for Production ("MTC's First Supplemental Response"). MTC communicated that their First Supplemental Production in Response to Plaintiffs' First Set of Interrogatories and Request for Production ("MTC's First Supplemental Production") was contained in a flash drive, which would be delivered by mail to Plaintiffs' counsel at the Asylum Seeker Advocacy Project ("ASAP"). Plaintiffs anticipate being able to access MTC's First Supplemental Production on or around August 21, 2023.

7. Plaintiffs anticipate requiring until September 5, 2023, to file a motion to compel discovery, should one be required.

8. Plaintiffs and MTC have stipulated to this motion, and MTC does not oppose granting an extension of a motion to compel to September 5, 2023, should one be required.

For these reasons, Plaintiffs respectfully move the Court to extend the time to file a Motion to Compel until September 5, 2023.

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Respectfully submitted,

August 18, 2023

By: /s/ Jessica Hanson

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** Appearing pursuant to D.N.M.LR-Civ.
83.3(a).*

CERTIFICATE OF SERVICE

I certify that on August 18, 2023, I filed the foregoing document electronically through the CM/ECF system, which caused all parties or counsel of record to be served by electronic means.

By: /s/ Jessica Hanson
Jessica Hanson